

FILED

DEC 14 2022

**U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIO C. COOKS,

Defendant.

4:22CR708 RWS/JMB

INDICTMENT

The Grand Jury charges:

COUNTS 1 THROUGH 6

(Fraudulent Transfer of an Authentication Feature)

On or about the dates listed below, in the Eastern District of Missouri, the defendant,

MARIO C. COOKS,

in a manner affecting interstate commerce, did knowingly transfer an authentication feature, that being, or appearing to be, a watermark and seal of the State of Missouri Department of Revenue, on counterfeit State of Missouri temporary motor vehicle license tags identified below, knowing that such feature was stolen and produced without lawful authority, and the authentication feature was or appears to have been issued by or under the authority of the State of Missouri,

COUNT	DATE	LICENSE TAG NUMBER
1	June 28, 2022	06HL3A
2	August 26, 2022	06HM2Q
3	September 29, 2022	06HNBI
4	September 29, 2022	06HNBH
5	September 29, 2022	06HNBJ
6	December 6, 2022	06HQKL

All in violation of Title 18, United States Code, Section 1028(a)(2).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Sections 1028(a)(2), as set forth in Counts 1 through 6, the defendant shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to said offense. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

2. If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to

Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

TRACY L. BERRY, 014753 TN
Assistant United States Attorney